July 29, 2026
File No. 25225279.00

Dr. Megan Hawkins
Edgewater Generating Station
3739 Lakeshore Drive
Sheboygan, WI 53081

Subject: Groundwater Monitoring System Update – Certification
I-43 Ash Disposal Facility, Town of Wilson, Wisconsin

Dear Dr. Hawkins:

The groundwater monitoring system at the I-43 Ash Disposal Facility (I43) has been updated. The monitoring network was originally certified on October 11, 2017. The certification was updated on April 14, 2025, to add MW-306 to the monitoring network, and again on February 19, 2026, to add the Contact Water Swale Module to the list of CCR units monitored by the multi-unit monitoring system. The current update adds MW-307 and MW-308 to the monitoring network.

This letter certifies, pursuant to 40 CFR 257.91(f), that the monitoring system is designed and constructed to meet the requirements of 40 CFR 257.91. The monitoring system also meets the requirements of NR 507.15(3). The monitoring network is sufficient to accurately represent the quality of background groundwater that has not been affected by leakage from the coal combustion residuals (CCR) unit, and the quality of groundwater passing the waste boundary of the CCR unit.

Data from the groundwater monitoring system at the site will continue to be evaluated using the statistical method certified on October 11, 2017, in accordance with the requirements of 40 CFR 257.93(f).

The groundwater monitoring system at I-43 is a multi-unit system for the following CCR units:

- Phase 3, Module 1 (Existing CCR landfill)
- Phase 3, Module 2 (Existing CCR landfill)
- Phase 4, Module 1 (Existing CCR landfill)
- Contact Water Swale Module (New CCR landfill)

MW-307 and MW-308 have been added to the groundwater monitoring system as follows:

- Regional groundwater flow within the uppermost aquifer at the site is to the east. The original monitoring network was designed based on this regional flow direction.

- Interpreted groundwater flow directions in recent years have indicated that groundwater flow at the site is more northward. Data from MW-306, installed in 2024, supported this interpretation.

- In December 2025, MW-307 was installed to the northeast of Phase 3, Module 1 and MW-308 was installed to the north of Phase 4, Module 1 to support further evaluation of flow direction at the site and to reduce the horizontal spacing between monitoring wells.

- Groundwater elevations measured in spring 2026 at MW-307 and MW-308 are consistent with groundwater flow to the northeast, therefore, MW-307 and MW-308 have been added to the groundwater monitoring system as downgradient wells.

- MW-307 and MW-308 were installed as close as practicable to the downgradient boundary of the CCR unit, considering slopes and stormwater management features.

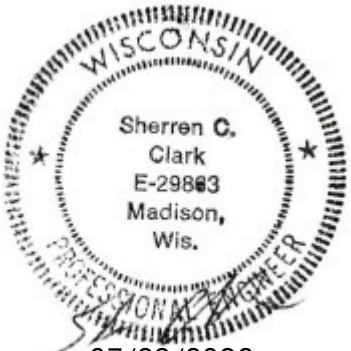
Based on the design information developed for placement in the site Operating Record to meet the requirements of 40 CFR 257.105(h)(2) and NR 506.17(2)(e) and provided for our review, the number, spacing, and depths of the monitoring system components were determined using site-specific information in accordance with 40 CFR 257.91(b) and NR 507.15(3)(b).

The groundwater monitoring system consists of two upgradient monitoring wells and six downgradient monitoring wells, which exceeds the minimum requirements of 40 CFR 257.91(c)(1) and NR 507.15(3)(c)(1).

The multi-unit groundwater monitoring system is equally as capable of detecting monitored constituents at the waste boundary of the CCR units as the individual groundwater monitoring system specified in 40 CFR 257.91(a) through (c), as required by 40 CFR 257.91(d).

Based on the installation documentation developed for placement in the site Operating Record to meet the requirements of 40 CFR 257.105(h)(2) and NR 506.17(2)(e) and provided for our review, the monitoring wells have been cased in a manner that will maintain the integrity of the monitoring well borehole and were constructed in accordance with the requirements of 40 CFR 257.91(e) and NR 507.15(3)(3).

PE CERTIFICATION



07/29/2026

I, Sherren C. Clark, hereby certify that the groundwater monitoring system at the I-43 Ash Disposal Facility has been designed and constructed to meet the requirements of 40 CFR 257.91. This certification is based on my review of documentation in the operating record regarding the design, installation, and development of the groundwater monitoring system components. I am a duly licensed Professional Engineer under the laws of the State of Wisconsin.

07/29/2026

(signature) (date)

Sherren Clark

(printed or typed name)

License number 29863-6

My license renewal date is July 31, 2026.

Pages or sheets covered by this seal:

Groundwater Monitoring System Update – Certification, all pages.

Sincerely,

Sherren Clark, PE, PG
Project Director
SCS Engineers

Thomas J. Karwoski, PG
Senior Project Manager
SCS Engineers

MDB/AJR/TK/SCC

cc: Matt Bizjack, Alliant Energy
Jeff Maxted, Alliant Energy

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